



Policy and Education Committee

4 April 2022

Review of Guidance for Osteopathic Pre-registration Education and development of Standards for Education and Training

Classification Public

Purpose For decision

Issue The review of Guidance for Pre-registration Osteopathic Education (GOPRE) and Standards for Education and Training (SET): consultation analysis and final draft for consideration.

Recommendations

1. To consider the consultation analysis and updated Graduate Outcomes for Osteopathic Pre-registration Education and Standards for Education and Training.
2. To agree the change of name to Graduate Outcomes for Osteopathic Pre-Registration Education and Standards for Education and Training.
3. To agree the Standards for Education and Training and Graduate Outcomes for Osteopathic Pre-Registration Education as the statement of the Committee under Rule 3 of the General Osteopathic Council (Recognition of Qualifications) Rules 2000.
4. To agree to recommend the Graduate Outcomes for Pre-registration Osteopathic Education and the Standards for Education and Training to Council for publication and subsequent implementation from 1 September 2022.

Financial and resourcing implications

The review is being managed in-house. We have commissioned experts to review our Equality Impact Assessment and the Guidance for Osteopathic Pre-registration Education and Training and to review and advise on specific consultation questions in relation to equality, diversity and inclusion costing £2,500.

In addition, we have made small payments to participants with particular protected characteristics as these views were under-represented in our pre-development feedback. Costs are less than £600.

Equality and diversity implications Equality and diversity implications are being taken into account. An Equality Impact Assessment has been



developed. This identifies a range of associated actions during the development, consultation and decision-making phases and subsequent actions necessary for implementation

As indicated by the equality impact assessment, we received specific advice on the draft guidance and on the equality impact assessment and we have held two focus groups and also interviews and correspondence with individuals in order to inform the development of the guidance and consultation questions.

We will also seek a final review ahead of Council in May 2022.

**Communications
implications**

We have been undertaking ongoing engagement with stakeholders throughout the development period.

Annex

Annex A – Consultation analysis report

Annex B – Updated Graduate Outcomes for Pre-registration Osteopathic Education (GOPRE) and Standards for Education and Training (SET)

Annex C – Current Equality Impact Assessment

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Key messages

- This paper provides an analysis of the outcomes of the consultation on the Guidance for Pre-registration Education and Standards for Education and Training.
- The outcomes were considered with the Stakeholder Reference Group on 28 February 2022.
- The updated draft GOPRE and SET included as Annex B to this paper reflect the points raised in the consultation as considered in the report and by the Stakeholder Reference Group.
- It is suggested that the document be renamed Graduate Outcomes for Osteopathic Pre-registration Education and Standards for Education and Training.
- The Committee are asked to consider agreeing the Standards for Education and Training as its statement under Rule 3 of the General Osteopathic Council (Recognition of Qualifications) Rules 2000.

Background

1. We reported to the Committee at its [March 2021](#) meeting with the updated Guidance for Pre-registration Osteopathic Education (GOPRE) and new Standards for Education and Training (SET), and the Committee agreed to recommend that Council publish these for consultation. Council agreed at its [May 2021 meeting](#) that these could be published for consultation.
2. The Consultation took place from 15 June until 22 September, in accordance with the agreed [consultation strategy](#).
3. In addition, the Osteopathic Education providers took part in a pilot annual reporting process for the 2020-21 academic year in which they reported against the draft Standards for Education and Training. This provided a further level of scrutiny of the standards in practice, and generated feedback which assisted in the development of the final draft
4. This paper presents the analysis of consultation outcomes, and an updated draft GOPRE and SET for the Committee's consideration and recommending to Council for publication.

Discussion

5. An initial overview of the consultation process with emerging themes was reported to the Committee at its meeting in [October 2021](#). To recap, The consultation documents are available on our [website](#). These followed the format of the draft GOPRE and Standards document, setting out a summary of changes

in each section, and asking a range of questions in each case. These included general questions and specific questions to explore views on issues raised throughout the development process, including:

- Patient partnership and values.
- Knowledge and skills outcomes.
- Research outcomes.
- Leadership, management and education outcomes, and options in relation to each of these.
- Business skills.
- Models of healthcare.
- Clinical hours and experience, and how these might be met.
- Common ranges of clinical presentation.
- How common ranges of osteopathic approaches to treatment are referenced.
- Whether equality, diversity and inclusion issues are sufficiently woven through the outcomes.
- Mechanisms of implementation

6. In relation to the Standards for Education, we explored views on:

- Equality, diversity and inclusion, again, as referenced within the standards.
- Student, patient and public involvement in programme design.
- Standards around 'speaking up' in relation to learning culture.
- Whether the standards sufficiently address the meeting of students' diverse needs.
- The requirement to provide a varied and diverse clinical experience.
- Staff support, training and development standards.
- Patient safety and wellbeing at the centre of osteopathic education.

7. The draft Standards for Education and Training set out nine themes, each with a set of standards that education providers must ensure and be able to demonstrate. These themes are:

- Programme design, delivery and assessment
- Programme governance, leadership and management
- Learning culture
- Quality evaluation, review and assurance
- Resources
- Students
- Clinical experience
- Staff support and development
- Patients

8. The consultation was promoted through our usual channels, including social media, ebulletins to registrants, and direct emails to key stakeholders, including:

educational providers, NCOR, The Institute of Osteopathy, the Osteopathic Alliance, other regulators, the PSA, and HEE and the devolved administrations. using a variety of media including a video, a news story and a blog.

9. We arranged a series of focus groups or discussions including with:
 - Patients
 - COEI (as a focused session within a GOsC/COEI meeting)
 - The Osteopathic Alliance (we attended their Committee meeting)
 - The iO Council (we introduced the consultation at an iO Policy and Standards Committee meeting)
 - Osteopathic Students
 - Osteopathic Educators
 - Regional Group Leads
 - Osteopaths working in NHS roles
 - Registration assessors

10. As we reported in October 2021, it was anticipated that this would not be a high-volume response consultation. Whilst this is an important area in terms of a key area of regulatory function, it's immediate impact on the profession generally may not always be evident. The focus group activities with a range of stakeholders outlined at paragraph were successful, however, in gaining insights and perspectives, and have led to some rich feedback as reflected in the analysis report. The range of stakeholders was broad, and their input has ensured that the consultation was successful in terms of its outcomes, enabling the issues to be effectively explored and considered.

Analysis report

11. The Consultation Analysis report is included as Annex A. The format of this is explained within the report itself, but includes a review of the themes arising with issues that arose in relation to each, and which were considered at a meeting of the Stakeholder Reference Group on 28 February 2022. The report also reflects all the written feedback received in relation to the GOPRE and SET consultation questions in two tables, with commentary.

12. We have also received feedback from the osteopathic educational institutions who piloted the draft Standards for Education and Training and this has been incorporated into the final draft document.

Updated draft GOPRE and SET

13. The updated GOPRE and SET in Annex B reflect the changes outlined within the analysis, as discussed with the Stakeholder Group. Amendments to the consultation draft are show in red for clarity in this version.

14. Feedback from education providers in relation to the annual report pilot against the draft SET was generally positive, and related more to the process itself than the drafting of the standards. There was one comment in relation to the status of GOPRE and guidance, and the relationship with the SET:

"In the many discussions held around GOPRE, it was made clear by GOsC that GOPRE was guidance not standards. However the new SET appears to lay out some new material and then add 'and GOPRE'. This suggests a change in the status of GOPRE contrary to the discussions held in the consultation phase.

Which brings us back in a loop to the specification of an arbitrarily determined number of clinic hours and new patient count."

15. Whilst it is the case that some aspects of the current guidance offer a degree of flexibility in interpretation (for example, the expectation of clinic hours and numbers of new patients seen), it is not the case that the overarching outcomes are optional, and the GOPRE is a regulatory document against which the delivery of programmes is reviewed.
16. It is suggested that for clarification, we remove the word 'guidance' from the document title, and instead rename this as Graduate Outcomes for Osteopathic Pre-Registration Education and Standards for Education and Training.
17. A statement has been added to the SET to confirm that the meeting of these standards is something that the Committee will wish to be satisfied before advising Council to recognise a qualification as provided under the Osteopaths Act. This is consistent with The General Osteopathic Council (Recognition of Qualifications Rules) 2000, which provide:

*The **Committee shall publish a statement**, and may from time to time amend the statement, indicating—*

- *(a) matters on which the Committee will wish to be satisfied before advising the General Council to recognise a qualification under subsection (2) of section 14 of the Act; and*
- *(b) matters which may cause the Committee to advise the General Council not to recognise a qualification under that subsection.*

Equality Impact Assessment

18. The updated Equality Impact Assessment is included as Annex C. We report in the consultation analysis on the outcomes of the consultation analysis in regard to EDI issues, and have reflected the suggested amendments in the updated draft. Prior to reporting to Council, we will seek final input from the EDI consultants who advised us initially.

Next steps

19. It is intended to report the final GOPRE/SET to Council at its May 2022 meeting and seek approval to publish these with implementation from 1 September 2022.
20. We have worked with the osteopathic education providers throughout this process, with COEI representatives on the Stakeholder Group, and in discussions at COEI meetings. The pilot annual report process for 2020-21, submitted in December 2021, provided an opportunity for OEIs to reflect on and report their

current delivery of the draft Standards for Education and Training and to prepare for the final implementation of these. As the Committee will be aware, analysis of the annual reports showed that OEIs were already meeting all themes of the draft SET. We will continue to work with COEI to support the implementation of the updated outcomes and SET once finalised in preparation for September 2022.

Recommendations:

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